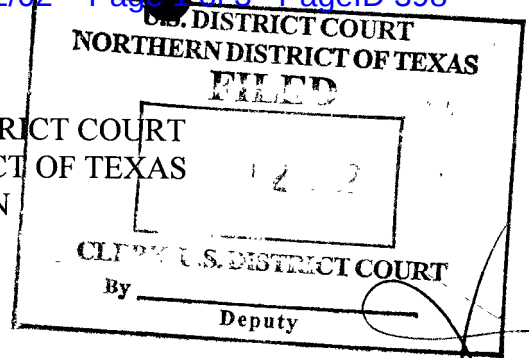


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



JAMAL ELHAJ-CHEHADE,
Plaintiff,

v.

EDUCATIONAL COMMISSION FOR
FOREIGN MEDICAL GRADUATES,
Defendant.

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CIVIL ACTION NO.

3:01-CV-01301-L

**DEFENDANT EDUCATIONAL COMMISSION FOR FOREIGN MEDICAL
GRADUATES' PROPOSED VOIR DIRE QUESTIONS**

COMES NOW EDUCATIONAL COMMISSION FOR FOREIGN MEDICAL
GRADUATES ("ECFMG"), Defendant herein, requests the following voir dire questions:

Defendant contends that the Plaintiff has not properly demanded a jury and that the Plaintiff's claims are barred by the statute of limitations and *res judicata*, thus preventing Plaintiff's claims from being tried by a jury. Further, Defendant contends that the Plaintiff's 501(c) allegations are not properly tried before a jury. However, out of an abundance of caution, Defendant has prepared these requested voir dire questions.

Additionally, Plaintiff's allegations are so unintelligible that Defendant cannot determine exactly what causes of action the Plaintiff is asserting. This makes it impossible to prepare a complete set of proper voir dire questions. Defendant would ask for leave to prepare additional questions should the Plaintiff's claims become more clearly presented or defined.

DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS

1. Is any prospective juror a foreign medical graduate?
2. If any prospective juror is a foreign medical graduate, please state whether your experience was a positive one. If it was negative, please explain why.
3. Has any prospective juror heard of, or had experience with, the Educational Commission for Foreign Medical Graduates?
4. If any prospective juror has heard of, or had experience with, the Educational Commission for Foreign Medical Graduates, please state whether you have a positive or negative inclination toward it. If it is a negative inclination, please state why.
5. Does any prospective juror have a negative opinion, in light of all of the recent reported corporate scandals, of a not-for-profit corporation?
6. If a prospective juror has a negative opinion of a not-for-profit corporation, can they be fair to the not-for-profit corporation in this case?
7. In light of all the recently reported corporate scandals, can you be fair to a corporation, regardless of whether that corporation is not-for-profit?
8. Is any prospective juror so distrustful of corporations that they cannot be fair to a corporate defendant?
9. Does any prospective juror believe that corporations lie more than they tell the truth? If so, please state whether that opinion prevents you from listening to the defendant's side of the story.

10. Has any prospective juror been either a plaintiff or a defendant in a civil lawsuit? If so, please state whether you can be fair to the defendant if you were the plaintiff or the plaintiff if you were the defendant.
11. Has any prospective juror been involved in a lawsuit where they sought damages for pain and suffering, mental anguish, or lost earnings (past or future)? If so, does that put the plaintiff slightly ahead of the defendant even before the evidence is presented?
12. Does any prospective juror believe that just because someone brings a lawsuit in federal court that it must have at least some merit?
13. Does any prospective juror believe that just because someone asks for money damages that they must be entitled to those damages requested?
14. In this case, the plaintiff is representing himself. Does that fact cause anyone to favor the plaintiff, or disfavor the defendant, before any evidence has been presented?
15. Does the fact that the plaintiff is representing himself cause you to feel sorry for him? If so, can you put those feelings aside?
16. Does the fact that the plaintiff is representing himself cause you to resent the defendant?
17. Does the fact that the plaintiff is representing himself cause you to believe that his claim must have merit, even before any evidence is presented?

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